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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12
13 UNITED STATES OF AMERICA,) NO. 3:22-CR-00210-SI
14 Plaintiff,)
15 v.) STIPULATION TO EXCLUDE TIME FROM
16 CHRISTOPHER WAGNER,) AUGUST 26, 2022 TO SEPTEMBER 9, 2022 AND
17 Defendant.) [PROPOSED] ORDER
18

19 It is hereby stipulated by and between counsel for the United States and counsel for the
20 defendant Christopher Wagner, that time be excluded under the Speedy Trial Act from August 26, 2022
21 through September 9, 2022.

22 At the scheduled change of plea hearing on August 26, 2022, the government and counsel for the
23 defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could
24 continue to prepare, including by reviewing the discovery already produced. For this reason and as
25 further stated on the record at the hearing, the parties stipulate and agree that excluding time until the
26 change of plea hearing now scheduled for September 9, 2022, will allow for the effective preparation of
27 counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of
28 justice served by excluding the time from August 26, 2022 through September 9, 2022 from

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
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1 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
2 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5

6 IT IS SO STIPULATED.

7 DATED:

/s/
CHRISTA HALL
Assistant United States Attorney

9 DATED:

/s/
DANIEL BLANK
Counsel for Defendant CHRISTOPHER WAGNER

12 [PROPOSED] ORDER

13 Based upon the facts set forth in the stipulation of the parties and the representations made to the
14 Court on August 26, 2022 and for good cause shown, the Court finds that failing to exclude the time
15 from August 26, 2022 through September 9, 2022 would unreasonably deny defense counsel and the
16 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
17 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by
18 excluding the time from August 26, 2022 to September 9, 2022 from computation under the Speedy
19 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and
20 with the consent of the parties, IT IS HEREBY ORDERED that the time from August 26, 2022 through
21 September 9, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
22 § 3161(h)(7)(A), (B)(iv).

23 IT IS SO ORDERED.

24

25 DATED: _____

Hon. Susan Illston
United States Senior District Judge

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